

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

KENDRA PARKS,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:16-cv-00146-JAG
)	
NC FINANCIAL SOLUTIONS OF UTAH,)	
LLC, <i>et al.</i> ,)	
)	
Defendants.)	

CONSENT MOTION FOR EXTENSION OF TIME

NC Financial Solutions of Utah, LLC (“NCFS-Utah”), by counsel, and pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, and Rule 7(F)(2)(b) of the Local Rules of this Court, hereby moves for an extension of time within which Defendants shall file responsive pleadings in this matter. NCFS-Utah states the following in support of its Motion:

1. Plaintiff filed her Complaint on March 8, 2016.
2. NCFS-Utah’s responsive pleading is due on April 8, 2016.
3. NCFS-Utah’s counsel, who was recently retained, continues to review the factual and legal allegations contained in the Complaint and seeks additional time to respond to these allegations. In addition, the requested extension will allow the parties to explore the potential of an early resolution of this matter.
4. NCFS-Utah’s counsel has communicated with counsel for Plaintiff, who is agreeable and consents to the requested extension.
5. This is NCFS-Utah’s first motion for an extension of time in this action.

6. The requested extension will neither prejudice the Plaintiff nor result in undue delay, particularly given the fact that the other named Defendant, NC Financial Solutions, LLC, has not yet been served in this action.

7. An Agreed Order is submitted with this Motion and is attached as Exhibit 1.

WHEREFORE, for the foregoing reasons, NC Financial Solutions of Utah, LLC respectfully requests that the Court: (1) grant its Consent Motion for Extension of Time; and (2) enter the Agreed Order extending up to and including May 6, 2016 for Defendants to file responsive pleadings to the Complaint.

NC FINANCIAL SOLUTIONS OF UTAH, LLC

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of April, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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